

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Center Point-Urbana Comm School District (10620000)
Dates of Review: December 5 – 7, 2017

Program Year: 2017
Month of Review: October
Lead Reviewer: Deb Linderblood
Org Representative(s): Matthew Berninghaus

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Only one person at the SFA knows how to make eligibility determinations and also how to do the verification process.	Indicate who will be trained to be a back-up person for the Determining Official and also trained on the verification process. State how this person will be trained and when.	
700 – Resource Management	V-0700	The SFA has not completed their Procurement Plan.	Attach a copy of your completed Procurement Plan.	
700 – Resource Management	V-0700	Fiscal action is still possible pending receipt of the December claim.	None	
700 – Resource Management	V-0700	The SFA does not currently have a policy regarding students with negative balances.	Develop and attach a policy for how the district will handle situations when a student has a negative account balance.	
700 – Resource Management	V-0700	The SFA does not have debarment statement from their vendors.	Obtain and attach a debarment statement from Martin Brothers and A&E.	
800 - Civil Rights	V-0800	The SFA does not have a policy for receiving and processing complaints alleging discrimination within FNS School Meal Programs.	Develop and attach a procedure for receiving and processing complaints alleging discrimination within the FNS School Meal Programs.	
800 - Civil Rights	V-0800	Staff have not had civil rights training for school year 2016-2017.	Provide civil rights training to all staff who interact with program participants. Attach a copy of an Attendance Log showing the date, start time, end time, presenter and signatures of those who attended.	
900 - SFA On Site Monitoring	V-0900	The SFA has not completed the on-site monitoring of breakfast as the SA has not released the monitoring form yet.	Complete and attach the breakfast on-site monitoring form for 50% of your sites.	
1000 - Local School Wellness Policy	V-1000	Currently the SFA does not have a Wellness Committee, potential stakeholders are not made aware of their ability to participate on the committee, the policy has incorrect statements and there has not been an assessment of the policy.	State your plans and provide a timelines for: 1.) Forming a wellness committee including who will be permitted to participate and how you will go about inviting them to participate 2.) Revising of the Wellness Policy 3.) How you plan to make the policy available to the public 4.) When reviews and/or revisions will be made to the policy 5.) When each school in the district	

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			will be assessed on the implementation of the Local School Wellness Policy 6.) How the district will make the assessment on the implementation of the Local School Wellness Policy available to the public.	
1200 - Professional Standards	V-1200	Food Service Managers have not started to obtain their required training for school year 2016-2017.	Attach documentation showing that the 3 Food Service Managers have started to obtain their required training (certificate, sign-in sheet, etc.)	
1200 - Professional Standards	V-1200	Full time and part time nutrition staff have not obtained any of their required training for school year 2016-2017.	Submit a written plan for documenting, tracking and organizing school nutrition staff continuing education. Attach a copy of training documentation completed for this school year showing that full time and part time nutrition staff have started to obtain the required training.	
1200 - Professional Standards	V-1200	Additional employees outside of the School Nutrition Program whose responsibilities include duties related to the operation of the School Nutrition Program (4 clerks) have not started to obtain the required 4 hours of training.	Attach documentation showing that the 4 clerks have started to obtain the required 4 hours of training.	
1400 - Food Safety	V-1400	The SFA's Food Safety Plan has not been reviewed or revised in a lot of years and is not reflective of what the SFA actually does in their day to day operations.	Develop and attach a plan for reviewing and revising your Food Safety Plan so that it: 1.) reflects your actual day to day procedures 2.) has documentation of when it was reviewed/revised 3.) it is used to train staff and hold staff accountable for following the plan. (include a table of contents with projected dates of when each SOP will be reviewed/revised).	
Resource Mgt Comprehensive Review	V-RMCRF	The SFA did not raise their prices high enough at the beginning of school year 2016-2017 to meet the required price increase (with 10 cent cap), which was \$2.48.	Indicate how you will adjust prices at some or all grade levels to bring the weighted average price up to the \$2.48 required price (with 10 cent cap).	
Resource Mgt Comprehensive Review	V-RMCRF	The SFA has not completed the nonprogram revenue tool and the calculations on the Financial Report on IowaCNP does not include nonprogram food cost from adult meals, second milk and second entrees.	Describe how you obtained your nonprogram food cost for SY15-16. Complete and attach the USDA nonprogram revenue tool. If the tool indicates that you are not bringing in enough nonprogram revenue indicate how you will increase the amount of nonprogram revenue you bring in.	

Site - Level Findings: Center Point-Urbana Middle School (0209)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA does not have signage at breakfast explaining what constitutes a reimbursable breakfast to student/cashiers.	Attach one week's worth of breakfast signage that will be used to explain what constitutes a reimbursable breakfast.	
400 - Meal Components and Quantities - Breakfast	V-0400	The SFA was short on grain one day during the week reviewed during October. Only .25 grain was offered. Meals were disallowed for this day for all four sites.	Complete and attach a week of middle school breakfast template showing that the meal pattern was met. Attach the corresponding "CN" labels, recipes and/or product formulation statements.	
400 - Meal Components and	V-0400	SFA only provided 1/4th cup of fruit on October 20, 2016. On a couple of days during the review	Select 1 week of your middle school lunch cycle menu (a different week than was used for the review week)	

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Quantities - Lunch		week, production records did not provide the serving size and/or the planned number of servings.	and complete and attach a lunch menu template showing that all components were offered. Attach corresponding production records for this week showing that the required portion size was prepared and showing the planned number of servings that were prepared.	
500 - Offer versus Serve	V-0500	The SFA does not have signage at lunch explaining what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable.	State your intentions to post signage that explains what constitutes a reimbursable meal including the requirement to select at least 1/2 cup of fruit or vegetable.	
1100 - Smart Snacks in School	V-1100	The SFA did not have documentation showing that the following products are or are not Smart Snack compliant: Oven baked cheddar and sour cream chips, Chocolate chip rice krispie bars, 4 oz. yogurt and 1 oz. string cheese.	Obtain and attach documentation for Oven baked cheddar and sour cream chips, Chocolate chip rice krispie bars, 4 oz. yogurt and 1 oz. string cheese showing if the item is Smart Snack compliant. If the item is not compliant indicate that you will discontinue offering it as an a la carte item or indicate the product you will replace it with and attach documentation that the replacement product is Smart Snack compliant.	

Org - Level Technical Assistance

Area	Question	Comments
700 – Resource Management		Provided student negative balance guidelines for SFA to use in developing a policy.
700 – Resource Management		TA provided and gave SFA detailed instructions on how to complete their Procurement Plan. Discussed that the SFA needs to obtain a debarment statement from their vendors and that contracts need to have the Buy American provision.
100 - Certification and Benefit Issuance	132 Does the SFA perform Direct Certification matches according to the required timeframes? If NO, how often are matches conducted?	TA provided that if a household turns in an application with a case number written on it, the SFA should try to find this household on Elookup. If found this household would then be directly certified.
1000 - Local School Wellness Policy	1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with FNS requirements? If NO, explain.	TA provided that there is a sample wellness policy on the DE web site that has a lot of examples of goals that could be incorporated into the SFA's wellness policy. Discussed that parents/students should be invited to participate on the Wellness Committee and that an assessment of the policy needs to be completed and made available to the public.
1600 - School Breakfast and SFSP Outreach	1600 How did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning of, the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	TA provided on ways to provide School breakfast outreach.
1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	TA provided on where to find SFSP promotional materials on the DE web site.
200 - Verification	208 a. Did the SFA attempt to directly verify selected applications?	TA provided that if the SFA selects an application for verification that has a case number written on it then they should use Elookup and if the household is located then this verifies their status and the household does not need to be informed that they were selected for verification.

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200 - Verification	212 If a student's eligibility changed due to verification,	TA provided that the household is to be given 10 calendar days to appeal a decrease in benefits. The SFA then has 10 operating days following the appeal period to change the benefit status.
300 - Meal Counting and Claiming	303 How often are cashiers and substitute cashiers trained on the meal counting and claiming system (including the backup system)?	TA provided that cashiers and substitute cashiers should have annual training.
800 - Civil Rights	800 What is the non-discrimination statement that is used for appropriate Program materials (please provide exact language)?	TA provided that the SFA needs to update their web site with the current USDA nondiscrimination statement and to add the Iowa nondiscrimination statement.
800 - Civil Rights	801 Does the School Food Authority have a Public Release?	TA provide on where to find the State Agency prototype public release and that this should be provided to the local media prior to the beginning of each school year.
800 - Civil Rights	805 How are students with special dietary needs accommodated?	The SFA is using the current Diet Modification Form however it is kept with the nurse. TA provided that the nurse should provide dietary with a copy of the form.
Resource Mgt Comprehensive Review	1 Did the SFA charge at least the minimum weighted average paid lunch price at ALL sites?	TA provided that since the SFA charges different prices at the different schools that they should complete the optional Step 3 of the PLE tool so that they obtain a weighted average price. This price can then be compared to the required price increase needed to be sure they are raising their prices sufficiently.
Resource Mgt Comprehensive Review	7 Did the SFA correctly calculate its nonprogram food ratio and its food cost ratio?	TA provided that the SFA's nonprogram food cost needs to include adult meals, 2nd milks and 2nd entrees. These costs will then be added onto the cost of a la carte purchases. Provided Food Service Director with a tool for determining the cost of recipes.

Site - Level Technical Assistance Center Point-Urbana Middle School (0209)

Area	Question	Comments
1300 - Water	1300 Is free potable water available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)?	TA provided that students need to be allowed to go to the water fountain and if the fountain is too far away for students to be allowed to go to it, then pitchers of water and cups should be provided in the cafeteria.
400 - Meal Components and Quantities - Breakfast	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	TA provided that at breakfast the SFA must offer 1 oz. eq. of grain before they can offer a meat/meat alternate. There is no separate meat/meat alternate component in the SBP. Schools may substitute 1 oz. eq. of meat/meat alternate for 1 oz. eq. of grains after the minimum daily grains is met.
400 - Meal Components and Quantities - Lunch	402 Are the minimum daily quantity requirements met for the age/grade group being offered?	TA provided that by school year 2016-2017 SFA must use the new CACFP meal pattern for their pre-school children. Gave Food Service Director a copy of the new meal pattern.
400 - Meal Components and Quantities - Lunch	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	TA provided on where to find the milk substitutes that are nutritionally comparable to cow's milk that the SA has on their web site.
400 - Meal Components and Quantities - Lunch	410 a. Do planned menu quantities meet meal pattern requirements for the review period?	TA provided that the Food Service Director can/should put the portion size for each grade group on the production records instead of having the cooks do this to be sure the food service staff know the correct serving size for each grade group.
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve? If NO, explain and list the technical assistance provided.	TA provided that cashiers and staff that serve on the line should have offer vs. serve training yearly.

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900 - SFA On Site Monitoring	901 a. Was the on-site review of the lunch counting and claiming procedure completed prior to February 1?	TA provided that starting this year, SFA's will be required to complete the On-site monitoring form for 50% of their sites. SA will be releasing the form in the near future.
Dietary Specifications Assessment Tool - Lunch	14 Other seasonings, such as herbs and spices, are substituted for salt.	TA provided that when the SFA uses up the garlic salt they should switch to garlic powder.

Org - Level Commendations

Description
Certification and Benefit Issuance: Benefit documents were very well organized. The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined. All applications were correctly determined, signed and dated by the household member and the SFA, were complete with SSN's and case numbers, and all applications were determined within ten days. The SFA prints their calculations with the income figures off of ICAVES and attaches it to the application. Income was only converted to annual when there was more than one frequency of income. Rollover applications were removed if the household did not apply within thirty days of the school year. Access to benefit information is correctly limited. Free meals are extended to all members in the household. Waivers are provided to applicants. The SFA has a back-up system for benefit issuance documents and system.
Civil Rights: The And Justice for All civil rights poster was posted in the cafeteria. Students with special dietary needs are correctly documented and accommodated. Ethnic/racial information is collected and the form is completed. No discrimination was observed.
Food Safety: The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site reviewed. The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for coolers, freezers, food served, and the dishwasher. Good food safety procedures were observed, including glove usage and hair restraints. Opened foods were labeled and dated and all food was at least 6 inches above the floor. At the high school 2 staff members are ServSafe certified, 3 at the middle school, 2 at the intermediate school and 2 at the elementary.
On-site Monitoring: The on-site monitoring forms were completed for 100% of the SFA's sites for lunch prior to February 1st, 2016.
Professional Standards: The newly hired Food Service Director meets the hiring standards and is ServSafe certified. Tracking of professional training is being completed by the Food Service Director. The Food Service Director obtained 41 hours of professional training and the majority of the nutrition staff obtained the required training for school year 2015-2016.
Reporting and Record Keeping: Reports are filed on time, and all records are maintained for at least three years plus the current year
Resource Management: All expenditures that were reviewed appeared allowable. There were no unresolved findings from the previous Administrative Review or from a state audit. The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months. The Paid Lunch Equity, PLE, tool was completed. No indirect costs are charged the food service program. Money is not transferred out of the account to support other programs. The SFA effectively utilizes its USDA entitlement for commodities, using 99.4% of their PAL in school year 2015-2016.
Smart Snacks: Students are able to purchase foods via a la carte sales and only water is sold in the vending machine. Exempt leftover NSLP entrees are only sold the same day they are initially offered.
Verification: The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income, and the process was completed on time. The application selected for verification was confirmed prior to verification. The SFA had one person attend training. The verification report was completed accurately and on time.
Wellness Policy: The SFA's wellness policy was reviewed and revised on 4/8/2015. The public is made aware of the SFA's wellness policy via the district's website.

Site - Level Commendations Center Point-Urbana Middle School (0209)

Description
Meal Components and Quantities: A nutrient analysis was not required. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. All meals observed met at least the minimum daily requirements. A variety of fruits, and vegetables are offered throughout the month for lunch—including many fresh fruits and vegetables. The SFA offers daily choices of fruits and vegetables. Water was available as required. At least two types of milk are offered. Many low fat and low sodium food items were observed in storage. Students had sufficient of time to eat after receiving meals.

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Meal Counting and Claiming: Meal counts during the on-site review were reasonable when compared to the review month counts. Point of Service (POS), counts and filed claims appear accurate. There is a POS for all students, and the POS is orderly. No overt identification of students who receive benefits was observed. Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. Monthly edit checks are performed.

Nutritional Quality of School Meals: The Food Service Director completed the USDA menu worksheets for the week of October 17-21, 2016 for breakfast and lunch at the middle school. The Food Service Director also completed the Dietary Specifications Assessment tool for breakfast and lunch which indicated that the middle school is at low risk for noncompliance with Dietary Specifications regulatory requirements. Some practices that help improve the nutrition quality of the school meals include: only using low-fat or fat-free milk for student consumption and in menu recipes, controlling the portion sizes of condiments, offering some reduced-fat, low-fat and fat-free salad dressings, using frozen vegetables in place of canned, limiting grain-based desserts to no more than 2 oz. eq. per week and draining fat from browned meats.

Offer vs. Serve: Offer vs. Serve is being implemented properly. All student's observed selected 1/2 cup of fruit and/or vegetable.